

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
ABDULRAHMAN ALHARBI,)	
)	
Plaintiff,)	
)	
v.)	Civil Action
)	No. 14-11550-PBS
GLENN BECK; THE BLAZE, INC.;)	
MERCURY RADIO ARTS, INC.; and)	
PREMIERE RADIO NETWORKS, INC.,)	
)	
Defendants.)	
_____)	

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

The Plaintiff submits the following proposed voir dire questions. The Plaintiff specifically reserves the right to alter, amend and supplement these questions based on the Court's pre-trial rulings in this matter.

1. Did you, any member of your family, or any of your close acquaintances attend the Boston Marathon on April 15, 2013?
2. Did you watch the television news coverage of the event?
3. Have you ever participated in the Boston Marathon?
4. Have you, any member of your family, or any of your close acquaintances witnessed or been a victim of a terrorist act?
5. Have you any member of your family, or any of your close acquaintances ever been the victim of a crime?
6. The Plaintiff in this matter is a Saudi Arabian citizen who has been in the United States legally since before April 15, 2013, on a student visa. Does the nationality of the Plaintiff affect your ability to decide his claims in an impartial manner?

7. Did you, any member of your family, or any of your close acquaintances hear or read about any statements made by Glenn Beck regarding the Plaintiff with respect to the Boston Marathon incident of April 15, 2013?
8. Have you, any member of your family, or any of your close acquaintances watched, read or listened to any media reports regarding this case?
9. Have you, any member of your family, or any of your close acquaintances ever worked for a media company (print, radio, television or internet)?
10. Have you, any member of your family, or any of your close acquaintances ever been a defendant in a defamation lawsuit?
11. Have you, any member of your family, or any of your close acquaintances performed any type of research (internet or otherwise) as to who perpetrated or funded the Boston Marathon incident of April 15, 2013?
12. Do you, any member of your family, or any of your close acquaintances belong to any groups or associations primarily concerned with the protection of First Amendment rights under the U.S. Constitution?
13. Have you, any member of your family, or any of your close acquaintances listened to, watched or read any broadcasts or publications by Glenn Beck, The Blaze or theblaze.com?
14. Do you think people who practice a certain religion or are of a certain nationality are more likely to commit terrorist acts than others.
15. Do you read in print or online a daily newspaper? What newspaper(s) do you read?
16. How often do you watch television news? What broadcasts or networks do you watch or listen to?
17. Are you a subscriber to any podcasts? What podcasts do you subscribe to or regularly listen to?
18. What is your major source of news and information?
19. What is your opinion of the news media?
20. How much trust and confidence do you have in the mass media to report the news fully, accurately, and fairly?
21. Have you followed any cases similar to this case ?

22. What did you think about the outcome of that (those) case(s)?
23. Have you ever written a letter to the editor of a newspaper or magazine? If so, what was the subject of that letter?
24. Have you ever called into a talk radio show? If so, what was the subject of that call? What radio station and show?
25. Have you ever participated in a blog? If so, what was the subject of the blog?
26. Have you ever held elective office?
27. Do you participate in your local town meeting?
28. Do you have faith and confidence in your elected local officials?
29. Can you think of anything in your own life that reminds you of this case? What and how?
30. Is there anything that you have seen or heard that would make it hard for you to guarantee to judge my client the same as the other side?
31. Is there anything you'd prefer to discuss in private?
32. If you were my client, would you be completely comfortable having you as a juror on this case?
33. Is there anything we haven't asked you that you think we should know?

/s/ Peter J. Haley
Peter J. Haley (BBO # 543858)
Gregory J. May (BBO# 642646)
NELSON MULLINS RILEY & SCARBOROUGH LLP
One Post Office Square – 30th Floor
Boston, Massachusetts 02109-2127
Telephone: (617) 573-4700
Facsimile: (617) 573-4710
Email: peter.haley@nelsonmullins.com
greg.may@nelsonmullins.com

Dated: September 7, 2016

CERTIFICATE OF SERVICE

I, Peter J. Haley, hereby certify that on this 7th day of September, 2016 this pleading was served upon counsel to the Defendants in this action.

/s/Peter J. Haley
Peter J. Haley